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7 *Attorneys for Defendant*

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 SHARON CHAND,) No. 3:21-cv-07773-RS
13 Plaintiff,)
14 v.) **JOINT REQUEST TO CONTINUE CASE
15 MICHAEL S. REGAN, Administrator,) MANAGEMENT CONFERENCE;
Environmental Protection Agency,) ORDER
16 Defendant.)
17)
18)
19 Plaintiff Sharon S. Chand (“Plaintiff”), and Defendant Michael S. Regan (“Defendant”), by and
20 through undersigned counsel, hereby STIPULATE and respectfully REQUEST that the Court vacate
21 and continue the Case Management Conference (“CMC”), presently scheduled for January 12, 2023, for
22 approximately 60 days until March 16, 2022, or until the Court rules on the outstanding Motion to
23 Dismiss the Amended Complaint (Dkt. 35).**

24 This action, filed on October 5, 2021, includes claims for employment discrimination. *See*
25 Dkt. 1. Defendant was served on December 27, 2021. Defendant moved to dismiss the Complaint on
26 February 25, 2022. *See* Dkt. 16. The Court dismissed the Complaint in part, *see* Dkt. 27, and Plaintiff
27 filed an Amended Complaint to re-plead the dismissed claims on August 1, 2022. *See* Dkt. 32.
28 Defendant moved to dismiss these claims on September 16, 2022. *See* Dkt. 35. On October 27, 2022,

1 the Court indicated that the motion would be submitted without oral argument. *See* Dkt. 41. The Court
2 has not yet ruled on the motion.

3 While the parties exchanged General Order 71 disclosures on December 9, 2022, *see* Dkt. 43, the
4 parties believe that holding the Initial Case Management Conference (and drafting a discovery plan)
5 after a decision is issued on the pending Motion to Dismiss and the claims at issue are crystalized will
6 conserve the resources of the parties and the Court.

7 Accordingly, the parties request that the CMC scheduled for January 12, 2023, be vacated and
8 continued until March 16, 2022 or until the Court rules on the outstanding Motion to Dismiss the
9 Amended Complaint (Dkt. 35).

10 SO STIPULATED.

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12 Respectfully submitted,

13 STEPHANIE M. HINDS
United States Attorney

14 Dated: January 5, 2023 By: /s/ Michael A. Keough
15 MICHAEL A. KEOUGH
Assistant United States Attorney
16 Attorney for Defendants

17 Dated: January 5, 2023 By: **/s/ Sharon S. Chand
18 SHARON S. CHAND

19 Plaintiff *Pro Se*

20 ** Pursuant to Civ. L.R. 5-1(h)(3), the filer of the document
21 has obtained approval from this signatory.

1 **ORDER**
2

3 IT IS HEREBY ORDERED that the Case Management Conference, presently scheduled for
4 January 12, 2023, is vacated. A Case Management Conference will be held on 3/16/2023 at 11:00 am.
5 Joint Case Management Statement due 3/9/2023.

6 Dated: January 5, 2023

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8 HON. RICHARD SEEBOORG
9 United States District Judge
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